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Via ECF

The Honorable Valerie Caproni
United States District Judge
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007

**REQUEST FOR EXTENSION
OF DISCOVERY SCHEDULE
AND ADJOURNMENT OF
PRETRIAL CONFERENCE**

MEMO ENDORSED

Re: *Tracey Riley v. JP Morgan Chase Bank, N.A.*
Docket No. : **19-CV-7283 (VEC)**
Our File No. : 19881.00111

Dear Judge Caproni:

Wilson Elser Moskowitz Edelman & Dicker LLP represents the defendant in the above-captioned matter. We respectfully submit this letter to request an extension of the discovery deadlines set forth in the Court's Civil Case Management Plan and Scheduling Order, dated November 1, 2019, and an adjournment of the next pretrial conference scheduled for February 7, 2020. This request is being made because the defendant did not receive authorizations to obtain plaintiff's medical and employment records until January 6, 2020. Although this office will expeditiously move to process the authorizations, it is expected that we will not receive plaintiff's records from her providers for, at minimum, four to six weeks. Moreover, pursuant to a conversation and agreement between counsels for the parties, additional authorizations from plaintiff are forthcoming. As the plaintiff's records are necessary in order to conduct a meaningful deposition, the defendant respectfully requests an extension of the below discovery deadlines to obtain and review the plaintiff's medical, employment, and workers' compensation records, prior to conducting the plaintiff's deposition.

The original discovery due dates and proposed extension dates are as follows:

Fact discovery deadline extended from January 31, 2020 to April 30, 2020;

Expert discovery deadline extended from March 16, 2020 to June 15, 2020;

In light of the foregoing, the defendant also requests that the pretrial conference be adjourned from February 7, 2020 to May 8, 2020, or any other subsequent date preferred by the Court. There have been no previous requests for an extension or adjournment of the aforementioned deadlines, and this request is being made with the consent of plaintiff's counsel.

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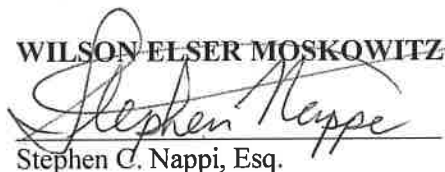
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Should the Court have any questions or wish to discuss this matter further, please contact the undersigned.

Respectfully submitted,

~~WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP~~



Stephen C. Nappi, Esq.

Cc:

Levin & Chetkof (counsel for plaintiff) via e-mail (hchetkof@levinchetkof.com)

According to the Case Management Plan dated Nov. 1, 2019, Plaintiff was required to provide medical authorizations no later than Nov. 15, 2019. Plaintiff is ordered to explain why it failed to meet that deadline, and Defendant is ordered to explain why it failed to inform the Court until nearly two months had elapsed since that date. The parties' submissions are due no later than **January 14, 2020**.

The Court defers ruling on extension of discovery deadlines pending the parties' submissions.

SO ORDERED.

Date: 01/07/2020



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE